

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

EUGENIO VARGAS,	§	
	§	
Plaintiff/Counterclaim Defendant,	§	
	§	
v.	§	Civil Action No. 4:22-cv-00430-O
	§	
ASSOCIATION OF PROFESSIONAL	§	
FLIGHT ATTENDANTS, JULIE	§	
HEDRICK, AND ERIK HARRIS,	§	
	§	
Defendants/Counterclaim Plaintiffs.	§	

PLAINTIFF'S DISCLOSURES PURSUANT TO F.R.C.P. 26 (a)

Pursuant to this Court's Order of June 13, 2022 (Dkt. No. 13), counsel for Plaintiff/Counterclaim Defendant Eugenio Vargas ("Plaintiff") submits these disclosures required by Federal Rule of Civil Procedure 26(a)(1) as follows:

- (i) **the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**
 - 1. Any and all former and current members of the Board of Directors of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
 - 2. Any and all former and current national officers of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current

national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.

3. Any and all staff current and former members of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information, testimony, correspondence, and documentation regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
4. Any and all current and former members of the executive committee of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
5. Any and all current and former members of the legal team of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty and Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
6. Any and all certified public accountants, accountants, partners, associates, staff members and affiliates of Wood, Stephens & O'Neil, L.L.P., its predecessors, affiliates and assigns whose current address includes but is not limited to 6300 Ridglea Place, Suite 318, Fort Worth, Texas 76116. (817) 377-1700. Information and

testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.

7. Bob Ross, c/o KD Phillips Law , 5700 Tennyson Parkway, Suite 300, Plano Texas 75024
8. Eugenio Vargas, c/o KD Phillips Law , 5700 Tennyson Parkway, Suite 300, Plano Texas 75024
9. Heidi Morgan: 704 Navaho St, Jupiter, Florida 33458
10. Nena Martin: 1404 Grizzly Hollow, Wentzville, MO 63385
11. Ruben R. Armendariz, Arbitrator, 8610 Cheviot Heights, San Antonio, Texas 78254
(210) 370860

(ii) **a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**

1. Copy of Arbitration Decision
2. Transcripts from Arbitration Hearing
3. Email correspondence between the parties regarding the arbitration
4. Copy of Transition Agreement
5. Correspondence from APFA to Plaintiff regarding wages
6. Copy of Signed Promissory Note between APFA and Plaintiff
7. Agreement between APFA and Laura Glading
8. APFA Constitution and Policies

C (iii) **a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and**

- (1) Legal Fees to Date: \$10,824.48
- (2) Arbitration and Costs Assessed in Arbitration Fees: \$8,623.17 + Additional Costs

- (3) Promissory Note: \$4,143.57
- (4) Lost Income: \$3,096.50
- (5) Damages for Breach of Credit Information: \$4,000
- (6) Reputational Harm: unknown
- (7) Lost Employment Opportunities: unknown
- (8) Punitive Damages: unknown

(iv) **for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

(1) Eugenio Vargas was insured per Federal Law mandates; however, all policy documents were left in possession of the Association of Professional Flight Attendants upon his departure in 2018, and no copies were retained, per Union Policy. He has not been provided this information to date, therefore is unable to provide the Defendants with this information.

Date: July 11, 2022

Respectfully Submitted

/s/ Kerri Phillips
KERRI PHILLIPS
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Counsel for Plaintiff Eugenio Vargas

CERTIFICATE OF SERVICE

I certify that on this 11th day of July 2022, I served a true and correct copy of the foregoing to the below persons through electronic filing and email.

SANFORD R. DENISON	denison@baabdenison.com
MARGOT A. NIKITAS	MNikitas@apfa.org
WILLIAM W. OSBORNE	b.osborne@osbornelaw.com

/s/ Kerri Phillips

Kerri Phillips

